

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

IN RE THE FORMER MARRIAGE OF	)	
KENTON GIRARD,	)	
	)	
Petitioner,	)	Case Number: 25-cv04586
	)	
v.	)	Removed from the Circuit Court of
	)	Cook County, Illinois,
JANE GIRARD,	)	Case No. 2015 D 9633
	)	
Respondent.	)	
	)	The Hon. Jeremy C. Daniel, Judge
(MARISSA GIRARD,	)	Presiding.
	)	
Third-Party Respondent.)	)	

**JANE GIRARD'S MOTION TO REMAND**

For the reasons set forth in her Memorandum in Support of her Motion to Remand, Respondent, Jane Girard hereby moves this Court for an order (i) remanding this case to the Circuit Court of Cook County, Illinois *instanter* to allow for the May 1 and 2, 2025 trial dates to proceed, and (ii) requiring Marissa Girard, the removing party, to pay her costs and any actual expenses, including attorneys' fees, incurred as a result of this improper removal.

Respectfully submitted,

**JANE GIRARD**

/s/ Matthew D. Elster

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 28<sup>th</sup> day of April, 2025, a copy of the foregoing ***Motion to Remand*** was filed via the court's CM/ECF system, which will send electronic notice to all counsel of record who have appeared in this case.

/s/ Matthew D. Elster